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October 25, 2021

Honorable Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Letter Motion: Extension of Time Request

Re: Anthony Ayala v. Comm'r of SSA 1:20-cv-09373-JGK (RWL)

Dear Honorable Judge Lehrburger:

Pursuant to the Revised Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on October 28, 2021. Plaintiff writes to respectfully request a second extension of time of sixty days (60) with the following proposed revised Scheduling Order:

- a) Plaintiff to serve her motion on or before December 27, 2021;
- b) Defendant to serve her cross motion on or before February 25, 2022;
- c) Plaintiff to serve her Reply, if any, on or before March 18, 2022.

Plaintiff requests the Court's indulgence with this second request for an extension. Despite counsel having 24 opening briefs due in October, we expected to complete Plaintiff's brief herein, but for unforeseen delays including a death in the family which required travel out of state and staffing issues. Counsel has another 26 motions due in the month of November and seeks to avoid any further requests for extension with this second request.

Defendant has been contacted and given his consent to this second request. Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre

Eddy Pierre Pierre, Esq.

Attorney for Plaintiff

(646) 992-8383

(718) 504-6962 fax

Cc: Heetano Shamsoundar, Esq. (Via ECF)
Attorney for Defendant.

SO ORDERED:

10/26/2021

A handwritten signature in black ink, appearing to read 'R. Lehrburger', is written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE